

**NAGEL RICE, LLP**

COUNSELLORS AT LAW

BRUCE H. NAGEL\*  
JAY J. RICE\*  
ROBERT H. SOLOMON  
BARRY M. PACKIN  
DIANE E. SAMMONS<sup>o</sup>  
LORI I. MAYER<sup>o</sup>  
RANDEE M. MATLOFF  
ANDREW L. O'CONNOR  
  
HARRY A. MARGOLIS  
(1928-2002)

119 MAPLE AVENUE  
RED BANK, NJ 07701  
(732) 933-0900

103 EISENHOWER PARKWAY  
SUITE 103  
ROSELAND, NEW JERSEY 07068  
(973) 618-0400  
FAX: (973) 618-9194  
www.nagelrice.com

PLEASE REPLY TO  
ROSELAND OFFICE

230 PARK AVENUE  
NEW YORK, NY 10169  
(212) 551-1465

OF COUNSEL  
CARLETON R. KEMPH<sup>o</sup>  
—  
GREG M. KOHN<sup>o</sup>  
JACOB W. RADDOK<sup>o</sup>  
ANDREW I. PEPPER

\*CERTIFIED BY THE SUPREME COURT OF  
NEW JERSEY AS A CIVIL TRIAL ATTORNEY  
<sup>o</sup> MEMBER OF N.J. & N.Y. BARS  
<sup>o</sup> ADMITTED IN N.Y. ONLY

September 23, 2011

*Via ECF and Express Mail*

The Honorable Michael A. Shipp, U.S.M.J.  
Martin Luther King, Jr. Federal Building &  
United States Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: *Beverly Clark, et al. v. Prudential Insurance Co. of America,*  
Civil Action No. 08-6197 (DRD) (MAS)**

Dear Judge Shipp:

Pursuant to the Court's Order dated August 3, 2011 (Doc. No. 176), the parties submit this joint status letter. There are no discovery-related disputes that require the Court's attention at this time, and the parties will be participating in mediation before Professor Eric Green in New York on November 21 and 22. With regard to expert discovery, the parties exchanged expert reports on August 22, 2011. They have not yet commenced expert discovery but will complete expert depositions by December 12, 2011, pursuant to the Court's Order dated September 20, 2011 (Doc. No. 178).

Respectfully submitted,

/s/ Bruce H. Nagel

Bruce H. Nagel  
for Plaintiffs Beverly  
Clark, Jesse J. Paul,  
Warren Gold, Linda M.  
Cusanelli, Carole L. Walcher  
and Terri L. Drogell

/s/ Douglas S. Eakeley

Douglas S. Eakeley  
for Defendant The Prudential  
Insurance Company of America

cc: All Counsel (via ECF and e-mail)